

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**Boston Edison Company, Cambridge Electric Light  
Company, Commonwealth Electric Company,  
d/b/a NSTAR Electric**

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**D.T.E. 03-121**

**ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS**

- AG-1-1      Please provide a copy of the embedded fully allocated cost of service study from each of the Companies' last base rate case. If the study is not one filed as part of the compliance filings, please annotate the studies relied on in designing the Companies current rates to show the final approved cost of service for each rate class.
- AG-1-2      Were the Companies' current customer charges designed to fully recover embedded customer costs in the most recent base rate case? If not, please provide documentation supporting the amount of customer related costs that were included in the distribution charges for each rate class in the Companies' last base rate cases. Include all workpapers, calculations and assumptions. The response should make specific reference to the embedded cost of service studies provided in the response to the previous data request.
- AG-1-3      Please provide a copy of the marginal cost studies used to develop each of the Companies' current rates.
- AG-1-4      If any of the Companies' current distribution rates were developed outside a base rate case, please provide all cost studies, analyses, calculations, workpapers, testimony and documentation supporting these rates. Include copies of all Department orders approving these rates.
- AG-1-5      Have the Companies considered providing tariffs for emergency power (unscheduled outages) and maintenance (scheduled off peak power), as separate tariffs? If yes, why were these options rejected? Please provide these tariffs and rates for each Company. Include all workpapers, calculations, documentation, description of how the rates were developed, and underlying assumptions.
- AG-1-6      Please provide copies of all current tariffs for back-up, stand-by, maintenance, intermittent, interruptible, non-firm, emergency service, or any other service that may be viewed as an alternative to the tariffs proposed by each Company.

- AG-1-7 Please provide copies of all current contracts with generators, cogenerators, distributed generators, IPPs, and self-generators governing the supply of power, under any conditions (back-up, stand-by, maintenance, intermittent, interruptible, non-firm, emergency service, etc.) by the Companies. Include all workpapers, analyses, documentation, calculations supporting the development of the rates for the services covered by the contracts. Provide copies of all testimony supporting the rates and Department orders approving each contract.
- AG-1-8 Please provide an illustrative non-firm standby rate(s) for a distributed generator with a name-plate rating of 60 kW that uses 15,000 kWh each month located in Boston Edison's service territory. Include all workpapers, calculations, and assumptions supporting the development of the rate(s).
- AG-1-9 Are the proposed rates designed to collect only transition charges based on actual kWh, not demand? According to the Restructuring Act the transition charge is non-bypassable. Customers that begin self generating kWh that previously would have been assessed transition charges, it appears, will be by-passing that portion of the transition charges. Please explain why this is not in violation of the statute.
- AG-1-10 Please describe each of the Companies' distribution system capital budgeting process beginning with the load forecasting and system maintenance planning functions. Describe the planning activities and planning horizon for each major category of distribution plant.
- AG-1-11 Please provide the Companies' most recent distribution system capital budget and supporting documentation, including a description of major system expansions, upgrades and maintenance projects for the next 5 years.
- AG-1-12 Have the Companies considered offering to compensate customers for interrupting service during distribution system peaks in order to delay making capital investments? Has such a plan ever been implemented? If yes, please provide the details--including all documentation supporting the compensation to be paid, any regulatory filings and approvals. Please provide an illustration of how the Companies would develop the compensation for such a program under current conditions.
- AG-1-13 Have the Companies considered offering to compensate customers for interrupting service during transmission system peaks in order to delay making capital investments? Has such a plan ever been implemented? If yes, please provide the details--including all documentation supporting the compensation to be paid, any regulatory filings and approvals. Please provide an illustration of how the Companies would develop the compensation for such a program under current conditions.
- AG-1-14 Do the Companies offer any interruptible rates? If yes, please provide copies of all tariffs and any related contracts. Include all documentation supporting the

rates, all filings made at the Department and related Department orders.

- AG-1-15 Does ISO-NE offer any compensation programs to self generating customers? If yes, please describe the requirements and the compensation paid.
- AG-1-16 Are self generating customers able to bid/offer into the New England market administered by ISO-NE? What types of services could they provide? How would a generator qualify to bid/offer these services? What levels of compensation would have been earned during 2003 for each of these services?
- AG-1-17 What costs are assessed a customer by the Companies when connecting a generating unit to the Companies' systems? Please explain how these costs were developed and provide all documentation, workpapers, calculations and assumptions supporting the costs. Include copies of all tariffs and standard contract forms related to interconnection of customers to the Companies' systems.
- AG-1-18 Refer to Mr. LaMontagne's testimony, p. 30. Please explain, in more detail, why the transmission component of the proposed rates is assessed on an as used basis and the distribution component is assessed on a contract basis.
- AG-1-19 Please provide a tabulation of the revenue received from each self generating customer on a monthly basis for the years 2002 and 2003 by rate component for back-up, stand-by, maintenance, and supplemental services, including Standard Offer and/or Default Service, if applicable. Identify each customer by a code that indicates the tariff or contract under which they receive each type of service(the codes for contract customers should agree with codes for the contracts provided in a previous response). Include the kWh and KW/kVa bill determinants for each rate element.
- AG-1-20 Based on the data provided in the previous response, please provide the monthly revenue that would have been generated for each customer had the proposed rates been applied. Include all workpapers, calculations and assumptions.
- AG-1-21 In the Companies' next distribution rate case how will the Companies include the stand-by and supplemental customers in the fully allocated embedded cost of service studies--as part of the rate class to which they would belong based on usage levels or as a separate class or classes? Explain in detail the basis for the response.
- AG-1-22 Are the Companies aware of any potential customers that will be eligible for the proposed rates? If yes, please provide the Companies' estimates of revenue during the first year each of the potential customers would be served under the proposed rates. Include all workpapers, calculations and assumptions.